

XP Investments US, LLC and XP Advisory US, Inc.

Client Relationship Summary

Dated: October 7, 2025



INTRODUCTION

XP Investments US, LLC (d/b/a XP Private, XP International, and XP Private International) (collectively referred to as “XP”) is registered with the Securities and Exchange Commission (“SEC”) as a broker-dealer. XP is a member of the Financial Industry Regulatory Authority (“FINRA”), the National Futures Association (“NFA”) and Securities Investors Protection Corporation (“SIPC”). XP Advisory US, Inc (“XP Advisory”) is an Investment Adviser registered with the SEC. Both firms are under common ownership.

Brokerage and investment advisory services and fees differ; it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at: [www.investor.gov/CRS](http://www.investor.gov/CRS) which also provides educational materials about broker-dealers, investment advisers, and investing. Scan the QR Code for more information.



What investment services and advice can you provide me?

We offer both brokerage and investment advisory services to retail customers.

XP Investments US, LLC Broker-Dealer Services/Brokerage Accounts	XP Advisory US, Inc Investment Adviser Services/Advisory Accounts
<ul style="list-style-type: none"><li>• Our key brokerage services are buying and selling securities, including corporate and government bonds, common stocks, mutual funds, options, and alternative investments such as private placements and similar investments. We also offer digital accounts with limited products and services. We facilitate securities backed lines of credit (SBLC). Click the link below for details.</li><li>• If you have a brokerage account, we do not offer account monitoring services, nor do we engage in discretionary trading of your account (meaning we do not direct the trading).</li><li>• Generally, we tailor our recommendations to the specific needs and objectives of our clients, recommending that you allocate certain percentages of your assets to various classes of investments such as stocks, bonds and other investments that meet your needs.</li><li>• Our financial professionals use a variety of methods to achieve your goals, including but not limited to analysis of global and local market trends and performance of specific products over time. You make the ultimate decision regarding the purchase or sale of investments.</li></ul> <p><b>For additional information</b>, please see our website here: <a href="http://www.xpi.us/disclosures">www.xpi.us/disclosures</a></p>	<ul style="list-style-type: none"><li>• We offer various forms of investment advisory services that include, <b>Discretionary</b> and <b>Non-Discretionary</b> accounts as well as wrap fee accounts, performance fee-based accounts, and financial planning services.</li><li>• When we use discretion, we make the investment decisions and place buy and sell orders in your account without contacting you before doing so. When you have a discretionary account, you grant us that authority in a written agreement. This permits us to decide on the specific securities, the amount of securities without obtaining approval for each transaction. In the instance you do not grant us discretionary authority, we must obtain your approval prior to placing any transactions in your account.</li><li>• Our investment approach depends on the program you choose. We tailor our advice to the specific needs and objectives of the client, which may include asset allocation or a model portfolio. Our financial professionals use a variety of methods to achieve your goals, including but not limited to analysis of global and local market trends and performance of specific products over time.</li><li>• We utilize both our affiliate, XP, and unaffiliated qualified custodians for execution of transactions. Unaffiliated custodians custody securities positions.</li></ul> <p><b>For additional information</b>, please see the SEC’s web site at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. There you can review our Form ADV, Part 2A brochure for more details about the advisory services we offer.</p>

For standard brokerage and investment advisory services our account minimum is \$500,000. For our Digital International brokerage accounts, there is no minimum. Digital accounts offer only limited products and services. All recommendations regarding your brokerage account will be made in a broker-dealer capacity, and all recommendations in your advisory account will be made in an advisory capacity. When we make a recommendation to you, we will expressly tell you orally which account we are discussing. When we make a recommendation about the type of account we believe you should open, we will consider information you provide to us in making that recommendation. There are material limitations on the types of accounts or products we may offer if your financial professional is not registered to offer those products or services. For example, a financial professional may be licensed only to offer brokerage or advisory services (but not both) or may not be licensed to sell all products we offer. In this case, that financial professional will not be able to offer you the type of product or service for which he/she is not registered. If you wish to have a type of account or security not offered by your financial professional, you should ask to be referred to another of our financial professionals.

### CONVERSATION STARTERS - Ask your financial professional.

Given my financial situation, should I choose an investment advisory service? | Should I choose a brokerage service? Should I choose both types of services? | Why or why not? | How will you choose investments to recommend to me? | What is your relevant experience, including your licenses, education, and other qualifications? | What do these qualifications mean? | Are there limitations on the types of products and services you can offer me?

#### What Fees Will I Pay?

XP Investments US, LLC Broker-Dealer Services/Brokerage Accounts	XP Advisory US, Inc Investment Adviser Services/Advisory Accounts
<ul style="list-style-type: none"><li>• When we offer you brokerage services, you pay a <b>transaction-based fee</b> on the specific transaction and not on the value of your account.</li><li>• Our commission is added to stocks and exchange-traded funds. Other investments, such as bonds, include a fee as part of the price you pay (called a <b>mark-up or mark-down</b>). These charges can range to 2% per transaction but are usually less.</li><li>• Mutual fund prices include a fee called a load or concession that reduces the value of your investment. Some include a <b>surrender charge</b> paid upon selling. These fees typically range between 0% and 4% of the value of the investment. Alternative investments concessions range from 0% to 8% of the value. We also earn fees which vary depending on the investment, but generally range between 0.25% and 1% per year on mutual funds, up to 3% per year on alternative investments, and up to 0.50% on cash sweep programs.</li><li>• We charge additional fees for services such as: account maintenance, margin, account transfers, wire transfers, account termination, ticket charges, etc. Follow the link below to view our fee schedule (in the Regulation BI Disclosure).</li><li>• For standard accounts, our account minimum is \$500,000 US and we charge a 0.1% per quarter (0.4% annual) maintenance fee for accounts below that minimum. This fee does not apply to digital accounts. However, all digital accounts will be assessed a <b>foreign currency conversion fee</b> by our affiliate. Click below for details.</li><li>• The more transactions in your account, the more fees charged. This can present a conflict of interest because a broker has an incentive to encourage you to engage in transactions. However, we maintain procedures to mitigate these conflicts.</li></ul> <p><b>For additional information</b>, please see our brokerage fee schedule and other fees at <a href="http://www.xpi.us/disclosures">www.xpi.us/disclosures</a>.</p>	<ul style="list-style-type: none"><li>• When we offer you advisory services, there are typically <b>asset-based fees</b>. Depending on the services we provide, there may be program fees and/or financial planning fees. For accounts valued at over \$1 million we also offer performance fee programs.</li><li>• Our program fees are up to 1.50% of assets under management on an annual basis. These fees are billed quarterly in arrears.. If you have a performance-based fee account, we charge up to 30% of the annual gross profits for the account.</li><li>• Our minimum investment to open an account is \$500,000 and the minimum annual fee for all accounts and services is \$5,000. This fee may be waived at our discretion.</li><li>• We also offer a wrap fee program. Under this program you pay a fee that includes management fees, certain transaction fees, custody and administrative costs. For this reason, wrap fee programs are often higher than asset-based fee programs that do not cover execution fees. Specific terms of the program are set forth in a written agreement. Overall costs may be higher or lower in a wrap fee program than if services were purchased separately. Wrap fee accounts are managed the same way that other advisory accounts are managed. XP advisory is the portfolio manager and sponsor of the wrap fee program.</li><li>• Fees charged by us are established in a client's agreement for advisory services. If you open an investment advisory account with us, the fee you pay is generally based on the value of your account (ongoing asset-based fees).</li><li>• Our fees are separate from the additional investment expenses, mutual fund, ETF, cash management, custodial, and other fees and expenses charged by custodians, executing brokers, and dealers.</li><li>• <b>For more details on the fees and charges</b> visit <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> and review our Form ADV, Part 2A brochure (specifically Item 5) and our Wrap Fee Brochure.</li><li>• In the instance that we charge an asset-based fee, the more assets there are in your advisory account, the more you will pay in fees. We therefore have an incentive to encourage you to increase the assets in your account.</li></ul>

Whether you choose advisory services or brokerage services, you will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying - scan the QR code.



### What are your legal obligations to me when acting as my investment adviser or providing recommendations as a broker?

### CONVERSATION STARTERS - Ask your financial professional.

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?

**When we provide you with a recommendation as your broker-dealer or act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide to you. Here are some examples to help you understand what this means.**

How else  
does your  
firm  
make  
money

AND

What  
conflicts  
of  
interest  
do you  
have?

XP Investments US, LLC Broker-Dealer Services/Brokerage Accounts	XP Advisory US, Inc Investment Adviser Services/Advisory Accounts
<ul style="list-style-type: none"> <li>• Certain of our product sponsors and third parties pay us to market their products to you, sponsor our conferences and events, and/or provide allowances to us for marketing and due diligence costs. These payments create conflicts because the incentives can influence us to favor the products of the sponsoring organizations. However, we maintain procedures designed to mitigate these conflicts.</li> <li>• When we buy or sell your investment through our own accounts (called principal trading), we can earn a profit on the transaction. This creates a conflict in that our interests are opposing. XP can make extra money by selling you certain investments either because they are managed by someone related to the firm or because they are offered by companies that pay XP to sell their investments. Your financial professional may receive more money if you buy these investments.</li> <li>• Investments or products issued, sponsored, or managed by us or our affiliates (including SBLCs offered by our affiliated bank, Banco XP) are called proprietary products. Because we generally make more money on proprietary products than on others, we have an incentive to offer these products.</li> <li>• If we are involved in an underwriting and we sell shares to our clients, a material limitation in our services is that we preference certain clients over others to receive shares in the offering. Also, we have a conflict in that the issuer is our client and we have an incentive to sell their securities.</li> <li>• Some products offer higher compensation than others. For example, you pay a lower fee for a stock than you would for a structured product. This creates a conflict because we have an incentive to sell you products with higher fees. However, we have procedures in place to mitigate these conflicts.</li> <li>• <b>More information</b> about fees, risks, expenses, revenue sharing, referral fees, and conflicts can be found in product prospectuses and transaction confirmations you receive at or before the completion of a transaction, and in our product-specific disclosures which you can find here: <a href="http://www.xpi.us/disclosures">www.xpi.us/disclosures</a>.</li> </ul>	<ul style="list-style-type: none"> <li>• XP acts as the introducing broker-dealer for some transactions its financial professionals effect as portfolio manager. We have a conflict of interest in recommending XP and its clearing brokers because it is an affiliate that receives compensation for brokerage transactions executed in advisory accounts and from its clearing broker for execution and other fees. These payments create conflicts of interest that can impair our objectivity when recommending XP and/or its clearing brokers.</li> <li>• We have the discretion to negotiate our fees, minimum account size, minimum annual fees, and other terms of each client's relationship with us.</li> <li>• If we recommend an advisory account, there may be limitations on the types of products that are available in the account depending on the program you choose because that program's portfolios may be limited to certain products or product families, which will likely change from time to time.</li> <li>• We manage accounts charged performance-based fees alongside accounts that are not charge these fees. This creates conflicts of interest. Specifically, if you have a performance-based fee account, we have an incentive to make investments that are riskier or more speculative than without the performance fee incentive. Also, we have an incentive to overvalue investments which lack a market quotation. We have an incentive to favor performance-based fee accounts, such as allocating limited investment opportunities, like Initial Public Offerings to those accounts. We have procedures to mitigate these conflicts.</li> <li>• We receive compensation for acting as an investment manager for affiliated investment funds. This creates a conflict of interest in that we have an incentive to recommend that our clients invest in the funds, increasing our compensation. We have procedures to mitigate these conflicts.</li> <li>• <b>For additional information</b>, please see the SEC's web site at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. There you can review our <a href="#">Form ADV, Part 2A brochure</a> for more details about our conflicts when we offer advisory services.</li> </ul>

If you have either a brokerage account or an advisory account, if we refer you to a third-party investment adviser you engage and we have a referral compensation agreement with that adviser, we will receive a referral fee (typically a portion of the advisory fee you pay them). This is a conflict because it creates an incentive to make referrals to them. You may choose any advisor. Also, our clearing brokers pay us fees and provide us with products and services that can influence us to use them. Also, we may rely on our clearing brokers to obtain best execution of our client's transactions. These factors create a conflict that clients should consider in deciding whether to accept our recommendation of a clearing broker's services.

### CONVERSATION STARTERS - Ask your financial professional.

How might your conflicts of interest affect me, and how will you address them?

## How do your financial professionals make money?

XP Investments US, LLC Broker-Dealer Services/Brokerage Accounts	XP Advisory US, Inc Investment Adviser Services/Advisory Accounts
<ul style="list-style-type: none"> <li>• Our financial professionals are compensated both a fixed amount and a variable amount.</li> <li>• When we make recommendations in your brokerage account, our financial professionals earn variable compensation based on commissions, markups/markdowns, or concessions generated on the products you buy and sell. This provides an incentive for the financial professional to sell more products and can create a conflict for the same reason. However, we maintain procedures to mitigate these conflicts.</li> <li>• We maintain an inventory of securities and engage in principal transactions with our clients. Our financial professionals earn variable compensation on these transactions. There is a conflict in that we are on the opposing side of the transaction when we buy from you or sell to you, thus our interests are opposed.</li> <li>• Our financial professionals, as part of their compensation, receive ongoing fees on certain products, often referred to as marketing/distribution fees. These fees are typically a percentage of assets in the product and range between 0.25% – 3% depending on the product. See the product prospectus for details.</li> <li>• Our financial professionals earn more variable compensation for some products over others. One example is complex products that can require more knowledge, time and expertise to sell such as structured products and alternative investments. Complex products are not appropriate for all investors. A conflict arises when the financial professional has a greater incentive to sell products that pay higher compensation. We maintain procedures to mitigate these conflicts. <a href="http://www.xpi.us/disclosures">www.xpi.us/disclosures</a></li> </ul>	<ul style="list-style-type: none"> <li>• When we act as your investment advisor in an advisory account, our financial professionals are compensated a fixed amount but also earn variable compensation based on the total assets under management or, if a performance account, a portion of that fee.</li> <li>• We enter into agreements with product sponsors and their affiliates that result in direct or indirect compensation to us and/or our financial professionals.</li> <li>• XP and our financial professionals (if they are broker of record on the account) receive compensation for transactions executed through XP and for the purchase of investment products recommended. This poses a conflict of interest because there is an incentive to engage in more transactions.</li> <li>• <b>For more details on the fees and compensation</b> visit <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> to review our <a href="#">Form ADV, Part 2A brochure</a> (Item 5).</li> </ul>

Whether you have a brokerage account or an advisory account, our financial professionals are compensated a fixed amount and a variable amount based on commissions they generate and assets under management. This means the more revenue they generate and the more assets under management, the greater they can earn. Our financial professionals may receive non-cash compensation such as incentives to attend certain events like conferences or other marketing or sponsor educational events. This creates an incentive for them to recommend more of the sponsor's transactions in client accounts. We maintain procedures to mitigate this conflict of interest.

### Do you or your financial professionals have legal or disciplinary history?

Yes. Visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals. For additional information about our financial professionals, visit FINRA BrokerCheck (<https://brokercheck.finra.org>). Also, find additional information about your investment advisor representative at <https://adviserinfo.sec.gov>. Scan the QR code for more information.



### CONVERSATION STARTERS. Ask your financial professional.

As a financial professional, do you have any disciplinary history? For what type of conduct?

### ADDITIONAL INFORMATION

**For additional information about our services**, visit our web site [www.xpi.us](http://www.xpi.us) and refer to your account and/or investment advisory agreement. You may also review additional product-specific disclosures at [www.xpi.us/disclosures](http://www.xpi.us/disclosures). If you would like additional up-to-date information or a copy of this disclosure, please call 786-783-1120 (XP) or 786-725-5983 (XP Advisory).

### CONVERSATION STARTERS - Ask your financial professional.

Who is my primary contact person?

Is she or he a representative of an investment adviser or a broker-dealer?

Who can I talk to if I have concerns about how this person is treating me?